

REMARKS

Request for Reconsideration

Applicants have carefully considered the matters raised by the Examiner in the outstanding Office Action but remain of the opinion that patentable subject matter is present. Applicants respectfully request reconsideration of the Examiner's position based on the above amendments to the Claims and the following remarks.

Claims Status

Claims 1-3, 5, and 7-24 are pending in this Application. Claims 21-24 have been withdrawn while the remaining claims are under prosecution.

Claim 1 has been amended herein to add the limitations of Claims 4 and 6, thus, Claims 4 and 6 have been canceled. This highlights that a cured resin forms the microscopically roughened structure of discontinuous structure.

Finally, Claim 7 has been amended herein to change its dependency because it is a cancellation of Claim 6.

Prior Art Rejection

The Examiner put forward the following six Prior Art rejections:

- (1) Claims 1, 2, 4, 5, 11-13 and 19 are rejected as unpatentable over Shoshi (US 5,998,013) and George (US 6,545,422);
- (2) Claim 3 is rejected as unpatentable over a combination of Shoshi, George and Namoiika (US 6,419,366);
- (3) Claims 6-10, 15, 17, and 20 are rejected as being unpatentable over a combination of Shoshi, George and Ohishi (US 2002/0034008);
- (4) Claim 14 is being rejected as being unpatentable over the combination of Shoshi, George and Logan (US 4,575,730);
- (5) Claim 16 is rejected as being unpatentable over a combination of Shoshi, George, Ohishi, and Hirose (US 6,533,852); and
- (6) Claim 18 is rejected as being unpatentable over a combination of Shoshi, George, Ohishi and Matsunaga (US 6,398,371).

In light of the fact that Claim 1 has been amended to add the limitations of Claims 4 and 6, the 2nd, 4th, 5th and 6th rejections are now deemed to be moot.

Turning to the combination of Shoshi, George and Ketchpel, Applicants had previously argued that it was improper to combine Ketchpel with the other references and

that even if Ketchpel was combined with the other references, the combination would not result in the present Invention. The Examiner noted that Ketchpel was used not to teach the specific material, namely, metal, to form his discontinuous reflective layer but, rather, the desire for the reflective layer to be discontinuous. Applicants submit that the Examiner has over simplified the Invention and the teachings in Ketchpel, and that the claims are patentable over the combined teachings of the references for at least two reasons.

First, the purpose of Ketchpels discontinuous layer is dramatically different from the purpose of the discontinuous layer of the present Invention, thus, one of skill in the art would not turn to Ketchpel in designating an anti-glare layer. Specifically, Ketchpel is teaching a transflector where the "reflective layer" acts as back lighting, see Ketchpel, column 2, line 55. Thus, the purpose of Ketchpel's reflective layer is to act as a source of light or, more properly, back light, for the displayed image. Ketchpel's purpose is distinctly different from the purpose of an anti-glare layer in the present Invention. The purpose of an anti-glare layer in the present Invention is to scatter the reflected light so

as to blur the image of the reflected image thereby making the reflected image almost unnoticeable, see the bottom paragraph on page 2 of the Application. Thus, the purpose of Ketchpel's discontinuous layer is substantially different than the purpose of the discontinuous layer in the present Invention. Because of the difference in the nature between the two layers, the discontinuous layer of Ketchpel and the discontinuous layer of the present Invention, it is submitted that one of skill in the art would not turn to Ketchpel for teachings of a discontinuous layer in an anti-glare film. To merely state that both layers are discontinuous, begs the question as to the purpose that each layer performs. The two discontinuous layers have dramatically different purposes that would prevent one of skill in the art from looking to the teachings of Ketchpel when designing an anti-glare layer.

Thus, Applicants again submit that one of skill in the art would not use the teachings of Ketchpel with the other references, because of the different purpose of the two "reflective layers". Ketchpel teaches that his reflective layer acts as a back lighting source for the displayed image. In contrast, the anti-glare layer of the present Invention does not act as a back light but, rather, blurs

the image of the reflected layer so as to make that reflected image almost unnoticeable. Because of the different purposes of the layer of Ketchpel versus the layer in the present Invention, it is submitted that one of skill in the art would not look to the teachings of Ketchpel in designing an anti-glare layer.

Second, because of the way in which Ketchpel's discontinuous layer operates, combining Ketchpel's discontinuous layer with other references would not result in the present Invention. Ketchpel's discontinuous layer blocks light from passing through the layer where the metal islands are formed. Such a discontinuous layer will not function as an anti-glare layer as claimed in the present Invention. The discontinuous layer in the present Invention transmits light as well as reflects light. Claim 1 recites that the ingredient that reflects the light is the resin and the resin allows light to pass through it. Thus, if the discontinuous layer of Ketchpel is added to the other references, the combination would not allow light to pass through the "island" that make up the discontinuous layer as taught by Ketchpel.

It is recognized that the Examiner is using Ketchpel for a "discontinuous" layer, but Ketchpel teaches his "discontinuous" layer blocks light from passing through the "islands". Respectfully, the way that Ketchpel's discontinuous layer operates will not result in the claimed Invention if Ketchpel is combined with the other references.

The anti-glare layer of the present Invention is produced by using a discontinuous structure of cured resin. The cured resin has a dual purpose. The cured resin reflects light but, also, it transmits light. As noted above, the anti-glare layer of the present Invention has a specific property of scattering or blurring light so as to make the reflected image almost unnoticeable.

Respectfully, one of skill in the art would not look to Ketchpel because his "reflective layer" has a distinctly different purpose and operates in a different way than the anti-glare layer of the present Invention. Thus, it is wholly inappropriate to simply ignore not only the specific teachings of Ketchpel but, also, the purpose of Ketchpel in order to reject the claims based on the cited references.

Conclusion

In view of the foregoing, it is respectfully submitted that the Application is in condition for allowance and such action is respectfully requested.

Should any fees or extensions of time be necessary in order to maintain this Application in pending condition, appropriate requests are hereby made and authorization is given to debit account #02-2275.

Respectfully submitted,

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